NATALIE K. WIGHT, OSB #035576 United States Attorney District of Oregon KATHERINE C. DE VILLIERS Assistant United States Attorney Katie.de.Villiers@usdoj.gov 1000 SW Third Ave., Suite 600 Portland, Oregon 97204

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Attorneys for the United States of America

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

1:23-cv-00582-MO

Plaintiff,

v.

TWO (2) REAL PROPERTIES LOCATED IN JOSEPHINE COUNTY, STATE AND DISTRICT OF OREGON WITH BUILDINGS, APPURTENANCES, AND IMPROVEMENTS, in rem,

NOTICE OF COMPLAINT FOR FORFEITURE AGAINST REAL PROPERTY

Defendants.

TO: Jose Orozco;

North West Land Development Group LLC

c/o Registered Agent Rocket Lawyer Corporate Services LLC;

Heaven on Earth Farms LLC

c/o Registered Agent Rocket Lawyer Corporate Services LLC;

Any and All Residents of 1530 Thompson Creek Road, Selma, Josephine County, Oregon;

Any and All Residents of 1100 Panther Gulch Road, Williams, Josephine County, Oregon;

Josephine County Recorder's Office;

Mortgage Electronic Registration Systems, Inc.

Notice of Complaint

A civil complaint seeking forfeiture pursuant to 21 U.S.C. § 881, was filed on April 20, 2023, in the United States District Court for the District of Oregon by Assistant United States Attorney Katherine De Villiers, on behalf of the United States of America, plaintiff, against the defendant real properties, *in rem*, 1530 Thompson Creek Road, Selma, Josephine County, Oregon; and 1100 Panther Gulch Road, Williams, Josephine County, Oregon more fully described as:

<u>Defendant Real Property 1</u> - 1530 Thompson Creek Road, Selma, Josephine County, Oregon. (Property ID R327419 and R3274192)

Commencing at the Northwest corner of the Northeast Quarter of the Southwest Quarter of Section 21, Township 38 South, Range 7 West of the Willamette Meridian, Josephine County, Oregon: thence South along the West line of said Northeast Quarter of the

County, Oregon; thence South along the West line of said Northeast Quarter of the Southwest Quarter, 270.13 feet, more or less, to the Northeasterly line of Thompson Creek Road; thence Southeasterly along said line, 309.2 feet, more or less, to a point which bears 525 feet South from the North line of said Northeast Quarter of the Southwest Quarter for the true point of beginning; thence East, parallel to the North line of said Northeast Quarter of the Southwest Quarter to the centerline of Thompson Creek; thence Southerly along said centerline to the Northerly right of way line of said Thompson Creek Road; thence Northerly along said right of way line to the true point of beginning. LESS AND EXCEPT all that portion lying Southerly of the following described line; Commencing at the Southeast corner of the Northeast Quarter of the Southwest Quarter of Section 21, Township 38 South, Range 7 West of the Willamette Meridian, Josephine County, Oregon; thence North along the East line of said Northeast Quarter of the Southwest Quarter, 220 feet 8 inches; thence North 65 degrees 13' 00" East to the centerline of Thompson Creek for the true point of beginning of said line; thence South 65 degrees 13' 00" West to the Northeasterly right of way line of Thompson Creek Road for the terminus of said line.

<u>Defendant Real Property 2</u> - 1100 Panther Gulch Road, Williams, Josephine County, Oregon.

(Property ID R328253 and R3282532)

A parcel of land in the Southeast Quarter of Section 2, Township 39 South, Range 5 West of the Willamette Meridian, Josephine County, Oregon being more particularly described as follows:

Beginning at the Southwest corner of the Southeast Quarter of the Southeast Quarter of said Section 2; thence along the West line of said Southeast Quarter of the Southeast Quarter, North 30.00 feet to the North right of way line of Panther Gulch Road, which is the true point of beginning; thence along said West line North 1290 feet to the Southeast 1/16 corner; thence West 1320 feet to the center South 1/16 corner; thence North 1320.00 feet to the center Quarter corner; thence East 2640.00 feet to the East Quarter corner; thence along the East line of said Southeast Quarter South 1235 feet, more or less, to a point 1405.00 feet North of the Southeast Corner of said Southeast Quarter; thence parallel to the South line of said Southeast Quarter, West 1260.00 feet, more or less, to a point 60.00 feet East of the West line of the East Half of said Southeast Quarter; thence parallel to said West line, South 1375.00 feet to the North right of way line of Panther Gulch Road; thence West 60.00 feet back to the true point of beginning.

The complaint alleges that said properties may, for the causes stated in the complaint, be forfeited to the United States.

All persons claiming an interest in or right against the defendant real properties may contest the forfeiture by filing a claim in the manner set forth in Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Federal Rules of Civil Procedure. The claim must be filed not later than the time stated in a direct notice sent under Rule G(4)(b), or 30 days after the final publication of notice if no direct notice was sent to claimant or claimant's attorney. In addition, any person having filed such a claim shall also serve and file an answer to the complaint under Rule G (5)(b) within 21 days after the filing of the claim. The claim must be filed with the Clerk of the United States District Court for the District of Oregon, 310 W. Sixth St., Medford, Oregon 97501. The claim and answer must be served upon Katherine C. De Villiers, Assistant United States Attorney, 1000 SW 3rd Ave., Suite 600, Portland, OR 97204.

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In accordance with 18 U.S.C. § 985, this Notice shall be posted on the defendant properties and this Notice shall be served on the property owner(s), along with a copy of the Complaint for Forfeiture.

DATED: April 20, 2023. Respectfully submitted,

NATALIE K. WIGHT United States Attorney

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney